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11 *12 Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank
13 of America, National Association as Successor by Merger to LaSalle Bank National Association,
14 as Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed
15 Certificates, Series 2005-HE6*

16 **UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA**

18 U.S. BANK NATIONAL ASSOCIATION,
19 AS TRUSTEE, SUCCESSOR IN INTEREST
20 TO BANK OF AMERICA, NATIONAL
21 ASSOCIATION AS SUCCESSOR BY
22 MERGER TO LASALLE BANK
23 NATIONAL ASSOCIATION AS TRUSTEE
24 FOR CERTIFICATEHOLDERS OF BEAR
25 STEARNS ASSET BACKED SECURITIES I
26 LLC, ASSET-BACKED CERTIFICATES,
27 SERIES 2005-HE6,

28 Case No.: 2:20-cv-01955-KJD-VCF

1 Plaintiff,
2 vs.
3
4 FIDELITY NATIONAL TITLE GROUP,
5 INC.; FIDELITY NATIONAL TITLE
6 INSURANCE COMPANY; DOE
7 INDIVIDUALS I through X; and ROE
8 CORPORATIONS XI through XX, inclusive,
9
10 Defendants.

11 **STIPULATION AND ORDER TO
12 EXTEND TIME TO RESPOND TO
13 MOTION TO DISMISS [ECF No. 45]**

14 **(First Request)**

15 Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank of
16 America, National Association as Successor by Merger to LaSalle Bank National Association, as
17 Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed
18 Certificates, Series 2005-HE6 (“U.S. Bank”) and Defendant Fidelity National Title Insurance

1 Company ("Fidelity"), by and through their counsel of record, hereby stipulate and agree as
2 follows:

- 3 1. On May 22, 2023, Fidelity filed a Motion to Dismiss [ECF No. 45];
- 4 2. U.S. Bank's deadline to respond to Fidelity's Motion to Dismiss is currently June 5, 2023;
- 5 3. U.S. Bank's counsel is requesting a brief seven-day extension until Monday, June 12,
6 2023, to file its response to the pending Motion to Dismiss;
- 7 4. This extension is requested to allow counsel for U.S. Bank additional time to review and
8 respond to the points and authorities cited to in the pending Motions;
- 9 5. Counsel for Fidelity does not oppose the requested extension;
- 10 6. This is the first request for an extension which is made in good faith and not for purposes
11 of delay.

12 **IT IS SO STIPULATED.**

13 DATED this 5th day of June, 2023.

14 WRIGHT, FINLAY & ZAK, LLP

15 /s/ Lindsay D. Dragon
16 Lindsay D. Dragon, Esq.
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17 7785 W. Sahara Ave., Suite 200
18 Las Vegas, NV 89117
18 *Attorneys for Plaintiff*

DATED this 5th day of June, 2023.

SINCLAIR BRAUN LLP

15 /s/ Kevin Sinclair
16 Kevin Sinclair, Esq.
17 Nevada Bar No. 12277
17 16501 Venture Boulevard, Suite 400
18 Encino, California 91436
18 *Attorneys for Defendants*

20
21 **IT IS SO ORDERED.**

22 Dated: June 6, 2023



23
24 UNITED STATES DISTRICT COURT JUDGE
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27
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